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BOARD OF COMMISSIONERS

250 No. Baxter Street, Coquille, Oregon 97423

(541) 396-3121 Ext. 225

FAX (541) 396-4861 / TDD (800) 735-2900

E-Mail: jgriffith@co.coos.or.us

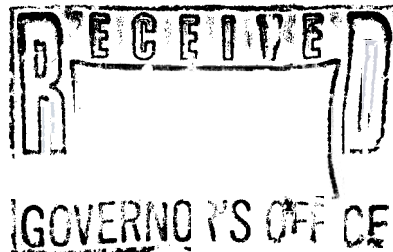
JOHN GRIFFITH

NIKKI WHITTY

KEVIN STUFFLEBEAN

20 November 2007

Gov. Ted Kulongoski
Governor's Office
245 Oregon Capitol Building
Salem OR 97310



Comments of Coos County Board of Commissioners on West Coast Governors' Agreement on Ocean Health Draft Action Plan

Although there are elements of this draft plan that are easy to support, others are unnecessary policy shifts from current management that could, in some cases, result in economic or social harm with no offsetting benefit.

In general comments, we address first Priority 3, "Effective implementation of ecosystem-based management." EBM, as it's abbreviated, is a shift from current management, which has brought stunningly positive results in marine species and habitat restoration in the ocean off Oregon. The Oregon Fish and Wildlife Commission and its department have done a good job of managing our marine waters. Oregon would be worse off by shifting from science to a more vague form of management.

At "Actions," on page 4, second bullet: "Preparing for the Effects of Climate Change," the text in *italics* states the term as 30-50 years. The Pacific Decadal Oscillation is about a 20 year sine wave, with Oregon temperature and rainfall tracking very closely. Moreover, solar irradiation, ice ages and other recognized climate change stimuli take place over a much longer cycle than 30-50 years. The effects of sea level rise relate to geology. At a conference October 25 in Yachats, a climatologist (OSU) and a geologist (DOGAMI) noted that the land mass of the southern Oregon coast, south of Florence, is rising faster than sea level, while the northern Oregon coast is sinking. So a plan for the whole West Coast takes too wide of focus. We also note that more and more United States and international top-tier climate scientists and atmospheric physicists are denouncing the United Nations' Intergovernmental Panel of Climate Change (IPCC) reports, so the degree of climate change and its causes remain open questions.

The topic of climate change is also at pg. 10 of the Draft Action Plan: "To model impacts to the West Coast under various likely climate change scenarios, the states will engage with academia and local, state, and federal government agencies, and will use the same frames of reference (i.e. models appropriate for providing inputs and assessing regional climate changes; scenarios published for greenhouse gas emissions) for predicting and responding to shoreline changes from storm surges and sea level rise." We reiterate our above remarks. It is the reliance on modeling

instead of data-based science.

At page 4, "Maritime Shipping Emission Controls," we point out that hundreds of fewer ship calls have annually been coming to Coos Bay than came even a few decades ago, so concerns about air pollution have been taken care of by market economics. Even if we get more ship calls, we do not anticipate nearly as many as we had before. West Coast governors could be taking a step backwards by tinkering with international shipping and its rules.

Same page, "Habitat Protection and Restoration," at 2.1, The Magnusen Stevens Fishery Conservation Act and its amendments already deal with Essential Fish Habitat, etc.

At 2.2, "restore estuarine habitats," Oregon law already protects estuarine habitats. Achieving a net increase in estuarine and wetland habitat is already happening, in many cases by poor land management or a switch from agriculture to passive land ownership, which in turn leads to wetland characteristics developing themselves. Remaining land managers are more and more hampered in maintaining their land for farming through increased regulation of drainage ditch maintenance and the increasing expense and regulations of keeping and maintaining tide gates. Our lowland pastures, sometimes referred to as "wet meadows" or "farmed wetlands," are the highest assessed farmland in Coos County. We and our agricultural economy would suffer from further efforts to "restore" these pastures to wetlands. They were all made by human industry before the end of the first decade of the Twentieth Century.

Ecosystem-Based Management, EBM, is reiterated at several places in the Draft Action Plan. We request, however, that before shifting away from a management system that has produced many good outcomes, a problem be identified and current management be analyzed for its strengths and shortcomings. Management shifts cost money, time and energy. Going from one to another should be based on objective data before they are commenced. Without science and data, how else could such decisions be defended? On this subject, at page 24, EBM "accounts for complexity and uncertainty of natural processes and social systems, incorporating adaptive policies in the face of uncertainties." We would argue that Oregon's current system of management does exactly that now. The "precautionary principle" is already applied to all fishery management decisions.

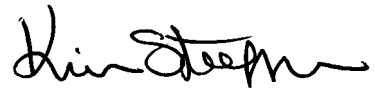
Thank you for the opportunity to comment



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Chairman



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Vice Chair



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Commissioner